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June 16, 2000

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Jane E. Jackson, Chief  
Competitive Pricing Division  
Common Carrier Bureau  
Federal Communications Commission  
445 12th Street, S. W.  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Transmittal of Telcordia Technologies' Consultant Report in support of July 1 Filing of Annual Access Charge Tariffs (DA 00-1269, CC Docket 94-1, CC Docket 96-45, CC Docket 96-262, CC Docket 99-249)

Dear Ms. Jackson:-

Telcordia Technologies was retained by members of the CALLS coalition to perform two functions in connection with their June 16 annual access charge filing: 1) to establish a method to assure that the Incumbent Local Exchange Carriers subject to Price Cap regulation take at least \$2.1 billion in reductions in Carrier Common Line (CCL) and Average Traffic Sensitive (ATS) rates and 2) to calculate the average price cap revenue reduction for all Price Cap ILECs and by each individual ILEC holding company, and to determine which ILEC holding companies have reductions greater than average. Results from the Telcordia Report have been incorporated into the tariff transmittals filed by the CALLS participant carriers.

The attached Affidavit and accompanying report and spreadsheets explains the methodologies used by Telcordia Technologies to obtain the results sought by the CALLS coalition.

Please associate the attached Affidavit, and accompanying Attachments with the public record in the proceedings referenced above.

Please don't hesitate to call if you have any questions regarding the attached information

Sincerely,

Louise L. M. Tucker  
Senior Counsel  
Washington

Attachments

Louise L. M. Tucker  
Senior Counsel - Washington  
International, Federal & State Regulatory

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BEFORE THE  
**FEDERAL COMMUNICATIONS COMMISSION**  
WASHINGTON, DC

RECEIVED

JUN 16 2000

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

In the Matter of

Access Reform, Price Cap	)	CC Docket 94-1
Performance Review for Local Exchange	)	CC Docket 96-45
Carriers, Low-Volume Long Distance Users,	)	CC Docket 96-262
Federal-State Joint Board on Universal Service.	)	CC Docket 99-249
	)	
Material to be Filed in Support of	)	
2000 Annual Access Tariff Filings	)	

**AFFIDAVIT OF P. C. HUREWITZ**

I, P. C. Hurewitz, being duly sworn, depose and say:

1. I am employed by Telcordia Technologies, at 3 Corporate Place, Piscataway, New Jersey, as Senior Consultant in the Rates and Tariffs Practice of the Business Optimization Services Unit. In this capacity, I have personal knowledge of the FCC Price Cap rules that apply to

Incumbent Local Exchange Carriers (ILECs) and of the FCC Order that implements portions of the Coalition for Affordable Local and Long Distance Services (CALLS) proposal.

2. I attended Clarkson University, graduating with a Bachelor of Science degree in Mathematics and a Bachelor of Science degree in Humanities in 1971. My initial employment was with AT&T Long Lines in 1972 in New York City, NY, in the Operations department of the New York City Area. While at Long Lines, I had other assignments in the Operations, Equipment Engineering, Cost Engineering, Accounts and Finance, and Service Costs departments.
3. I transferred to AT&T General Departments in 1979, into the Regulatory Department, where I was responsible for the development of Exchange Access Measurement Studies, designed to measure usage on exchange lines leased by Interexchange Carriers from the Regional Bell Operating companies. That work led to assignments which involved the development of Access demand, rate, and cost methodologies which were used during the preparations for the AT&T divestiture in 1984, and which were the precursors to Access Pricing and (later) Price Cap rules.
4. I came to Bellcore (now Telcordia) upon divestiture of AT&T in 1984, and was involved in the original negotiations with AT&T to develop initial, post-divestiture, access rate levels. Since that time, I have continued to work on matters relating to Access services, including involvement in the development of the original Price Cap proposals. I now specialize in Price Cap issues, and have written (and had submitted to the FCC) proposed rewrites of the FCC's part 61 and 69 rules, in connection with both Biennial Reviews and proposed Price Cap

modifications. I have been personally responsible for the development of the Tariff Review Plans (TRPs) since 1993, and have provided them to both ILECs and the FCC. I have developed and taught training classes about Price Caps and TRPs to Telcordia clients and to new FCC staff members. I have been deeply involved in the development of the methods for Price Caps, and was personally involved in determining implementation techniques for the CALLS proposal, including presentations to FCC staff members and development of TRPs and other worksheets.

5. CALLS members have asked me to perform two functions in connection with the ILEC annual filing to be made on June 16, 2000, and to file the results of the analyses as part of the necessary support material required by the Commission's Price Cap CALLS Order<sup>1</sup> and 2000 Annual Access Filing Order<sup>2</sup>:

a. To establish a method to assure that \$2.1Billion in reductions in Carrier Common Line (CCL) and Average Traffic Sensitive (ATS) rates are taken. This involved, among other things, development of a percentage up to which Local Switching revenues would have to be reduced by ILECs, and verification that total reductions at least equaled \$2.1Billion.

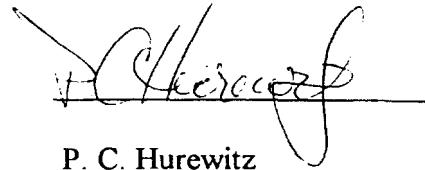
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<sup>1</sup> In the Matter of Access Reform, Price Cap Performance Review for Local Exchange Carriers, Low-Volume Long Distance Users, Federal-State Joint Board on Universal Service, Sixth Report and Order in CC Docket Nos. 96-262 and 94-1. Report and Order in CC Docket 99-249. Eleventh Report and Order in CC Docket No. 96-45. Released May 31, 2000. ("CALLS" Order).

<sup>2</sup> Public Notice In the Matter of Material to be Filed in Support of 2000 Annual Access Tariff Filings, released June 9, 2000. The TRP format to be used by the ILECs in their filings was filed with the Commission in an Ex Parte Letter from John Nakahata, Counsel to the Coalition for Affordable Local and Long Distance Service, filed May 8, 2000, Re: Coalition for Affordable Local and Long Distance service Proposal--CC Dockets 96-262, 94-1, 96-45, 99-249.

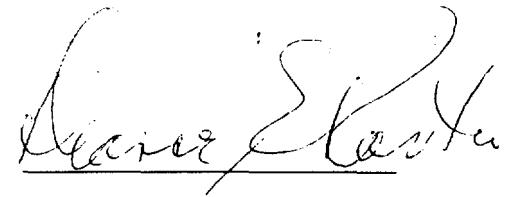
- b. To calculate the average price cap revenue reduction for all ILECs and for each individual ILEC holding company, and to determine which ILEC holding companies have reductions greater than average.
- 6. In order to accomplish this, I collected local switching and transport minutes of use and selected revenue and targeting data from each of the ILECs, and entered it into worksheets (developed by me with input and review by the industry team). Results were then transmitted back to members of the CALLS team. The procedures used to do this are described in Attachment A in more detail. The printouts of the spreadsheets that accomplished this are included as Attachment B. A copy of the disk containing the spreadsheets is also included.
- 7. The results of the functions performed in paragraph 5a above showed that the reduction percent for Local Switching was 31.55%, and that the sum of applicable revenue reductions was \$2,100,635,131. The results of the functions performed in paragraph 5b above showed that average industry Price Cap revenue reduction prior to incorporating pooling was 9.9869%, and that SBC, U S WEST, Sprint, Frontier, and INS all had reductions at the holding company level that were greater than average.

Further, affiant sayeth not.



P. C. Hurewitz

Subscribed and sworn to me this 15 day of June, 2000



Diane E. Porteous

Notary Public

DIANNE E. PORTEOUS  
No. 01P05049990  
Notary Public, State of New York  
Qualified in New York County  
My Commission Expires 09/25/01

My Commission expires: \_\_\_\_\_

DIANNE E. PORTEOUS  
No. 01P05049990  
Notary Public, State of New York  
Qualified in New York County  
My Commission Expires 09/25/01

**Methodology to develop allocation of mandated \$2.1B reduction in “average traffic sensitive” (ATS) revenues:**

**A. Overview:**

1. Incumbent Local Exchange Carriers (ILECs) participating in the Coalition for Affordable Local and Long Distance Services (CALLS) asked Telcordia:
  - a. to collect selected information from the July 2000 Annual Access Service filing from all of the ILECs
  - b. to determine the level of revenue reductions initially defined by those ILECs' rate-setting
  - c. to calculate the additional level of reductions needed to meet the FCC's requirement for \$2.1B in CALLS-related revenue reductions
  - d. to determine the percentage decrease in Local Switching revenue required to generate the additional revenue reduction
  - e. to calculate the average price cap revenue reduction for all ILECs and by individual ILEC holding company, and to determine which ILEC holding companies have reductions greater than average.
2. In order to accomplish these work items, three separate runs were required.
3. The objective of Run 1 was to develop an initial estimate of the percentage reduction in Local Switching revenues (above and beyond reductions achieved in USF removal, in Carrier Common Line (CCL) reductions, and in the targeting of GDPPI and X reductions to ATS

elements) required to achieve a total decrease in Carrier Common Line (CCL) and ATS revenues equal to \$2.1Billion. ILECs did initial analyses to develop estimates of their targeting requirements, rate levels, and revenue levels, using the CALLS rules and the Tariff Review Plan formats. They provided selected information from those analyses to Telcordia, where it was used to calculate an initial estimate of the necessary reduction in Local Switching revenue. The result of that run was that a reduction of 31.78% of Local Switching revenue would generate a sufficient change in revenues to produce a total revenue reduction of \$2.1B.

4. The output from Run 1 (the 31.78% reduction percent) was provided to the ILECs for their use in developing both a final allocation of targeting between the Switched Traffic Sensitive and the Trunking baskets, and a second, more accurate estimate of targeting requirements, rate levels, and revenue levels. Selected information from those analyses was again provided to Telcordia, where it was used in Run 2 to calculate a final Local Switching reduction percentage of 31.55%.
5. That percentage (31.55%) was disseminated to the ILECs for their use in creating final targeting amounts, rate levels, and revenue reductions. Finally, selected information from those last rate development analyses was sent to Telcordia so two things could be done:
  - 1) Telcordia could verify that at least \$2.1B in CALLS-related revenue reductions had been made; and
  - 2) Telcordia could calculate the average Price Cap revenue reduction (prior to pooling) both for the total industry and for each ILEC holding company. An ILEC holding company

whose percent reduction in total Price Cap revenues (before incorporating the impact of pooling) was greater than the average industry reduction was eligible for pooling, as specified in the FCC's rules, part 61.48(m)(1)(i).

**B. Detailed description of process to develop the Local Switching (LS) reduction percent.**

6. By CALLS ILEC jurisdiction, Telcordia collected information from initial runs of the ILECs Tariff Review Plans (TRPs).
  - a. Demand values for both Local Switching and LEC Transport minutes of use
  - b. ATS target levels
  - c. CCL and ATS revenue reductions associated .with the removal of Universal Service Fund (USF) from existing Price Cap rates
  - d. Revenues for current LS ATS elements, other Switching ATS elements, and Transport ATS elements
  - e. The amount of revenue reduction available due to the impact of productivity and inflation, using the formulas contained in part 61.45 of the FCC's rules.
  - f. Revenue reductions from the TRP which displayed the removal of Universal Service Fund (USF) elements from Price Cap rate elements
  - g. Revenue reductions within the CALLS TRP for Carrier Common Line (CCL) elements

7. By ILEC jurisdiction, calculated the current ATS revenues, as well as the average rate levels associated with Traffic Sensitive Switched services, Transport services, and total ATS services.
8. By ILEC jurisdiction, calculated the minimum and maximum amounts remaining to reach the ATS floor, and determined whether reductions in rates associated with the productivity and inflation reductions were sufficient to bring the jurisdiction's ATS rate down to its target level.
9. By ILEC jurisdiction, calculated the percentage reduction in LS revenues needed to bring the ATS rate down to its target level.
10. Determined the maximum level of reduction each jurisdiction would incur due by calculating the minimum of either:
  - a. the dollars required to take the ATS rate down to the target rate for that jurisdiction; or
  - b. the dollars associated with taking reductions associated with USF, CCL, and a percentage of Local Switching. For this initial run, the percentage of LS was calculated to be 31.78%.
11. This percentage was provided to the ILECs for their use in creating a second set of TRPs, etc., and data out of those TRPs (similar to the data collected in step 6) were again provided to Telcordia.

12. Repeated steps 7 through 10, to develop a revised Local Switching percent reduction of 31.55%, using the updated results provided by the ILECs.
13. This final LS reduction percentage was provided to the ILECs for their use in developing final rates and revenues, prior to the incorporation of pooling.
14. ILECs developed their final rates, revenues, and price cap indices, and completed their TRPs by jurisdiction. Out of those runs, they provided Telcordia with total USF removal, CCL, and ATS-related revenue reductions. Telcordia summed those values, and determined that the industry had taken a total of \$2,100,635,131 in reductions, which exceeded the \$2.1B requirement by \$635,131.

**C. Detailed description of process to calculate average Price Cap revenue reduction (prior to pooling) for the total industry and for each ILEC holding company**

15. Along with the data collected in step B14 (above), Telcordia collected revenue values for three separate items:
  - a. Total Price Cap revenues out of the CALLS TRP filing prior to incorporating the impact of pooling (calculated by pricing out 1999 demand at the rates proposed to go into effect with the CALLS filing)

- b. Total Price Cap "revenues" going into the USF removal filing (calculated by pricing out 1999 demand at the rates in effect at the time the USF removal filing would be made)
  - c. USAC receipts that will be collected.
16. Since the intent of this run was to develop the average reduction in Price Cap revenues, and the rates used in step 15b included USF receipts, it was necessary to remove them (or a valid proxy for them) from any comparisons made. Therefore, a calculation was made to create Total Price Cap "revenues" going into the USF removal filing excluding USF receipts by subtracting 15c from 15b.
17. The percent change in revenues was then developed for each jurisdiction by dividing the revenues from step 15a by the revenues from step 16.
18. An ILEC holding company percent change was calculated by summing the step 15a revenues from all of its jurisdictions, and dividing by the sum of the jurisdictions' step 16 revenues.
19. The total price cap ILEC industry percent change was calculated by summing the step 15a revenues from all of the jurisdictions, and dividing by the sum of all jurisdictions' step 16 revenues.
20. The percent change calculations (prior to pooling) for the price cap ILEC industry and for individual holding companies are as follows:

- Industry: - 9.9869%
- Bell Atlantic: - 9.5308%
- BellSouth: - 9.7831%
- SBC: -11.1206%
- U S WEST: -10.1613%
- GTE: - 7.8322%
- Sprint: -10.9946%
- Frontier: -11.8462%
- Cincinnati: - 7.9263%
- Citizens: - 9.3133%
- Valor: - 7.0015%
- Alltel (Aliant): - 1.9328%
- INS: -10.2232%

**ATTACHMENT B**

Allocation of Required Revenue Reduction  
 Filing Date 06/16/00 (Run 3; chainweighted GDPP)  
 Company Industry  
 CALLS TRP - July 2000

Page 1

Miscellaneous Inputs:	Source	Industry	Bell Atl Total	BellSouth Total	SBC Total	USWEST Total	GTE Total
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	2,100,000,000	N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	N/A	N/A	N/A	N/A	N/A	N/A
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	520,794,985,519	136,610,869,638	81,099,966,620	152,845,980,721	62,238,054,515	52,641,330,610
140 LEC Transport MOU	TGT1 r430	543,354,046,813	138,901,063,492	86,324,075,275	162,232,413,578	65,251,360,148	54,344,429,522
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G- F)	(274,200,821)	(11,804,282)	(82,455,470)	(83,941,049)	0	(68,638,004)
160 USAC receipts (at t)	CAP1 r660	544,942,636	54,721,190	83,569,561	19,088,139	27,877,506	255,474,546
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	2,732,585,218	747,561,870	366,055,927	844,339,066	280,330,744	250,720,558
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	614,843,314	163,302,031	89,037,192	204,165,669	61,046,706	58,313,532
220 Current Transport ATS Revenue	TGT1 r415	1,532,966,992	294,483,479	263,321,992	395,876,958	240,635,443	162,348,229
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	N/A	N/A	N/A	N/A	N/A
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	N/A	N/A	N/A	N/A	N/A
250 Current ATS Rate (Total)	r230 + r240	N/A	N/A	N/A	N/A	N/A	N/A
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	N/A	N/A	N/A	N/A	N/A
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	N/A	N/A	N/A	N/A	N/A	N/A
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	N/A	N/A	N/A	N/A	N/A	N/A
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Targetin TGT1 r550+r555		(868,197,556)	(205,788,471)	(135,668,478)	(243,217,202)	(92,743,212)	(119,759,550)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	N/A	N/A	N/A	N/A	N/A
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	N/A	N/A	N/A	N/A	N/A
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	N/A	N/A	N/A	N/A*	N/A
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(274,200,821)	(11,804,282)	(82,455,470)	(83,941,049)	0	(68,638,004)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(283,785,934)	0	(8,368,066)	0	0	(204,764,106)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(1,542,648,376)	(353,087,844)	(259,635,583)	(489,434,455)	(178,392,132)	(131,545,610)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	-r100	(2,100,000,000)	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(2,100,635,131)	(364,892,128)	(350,459,119)	(573,375,504)	(178,392,132)	(404,947,720)
560 Total Reductions	r510	(2,100,635,131)	(364,892,128)	(350,459,119)	(573,375,504)	(178,392,132)	(404,947,720)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>							
600 Revenue @ PCI(r-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	25,318,067,500	6,480,527,548	3,800,367,007	7,557,826,483	2,727,769,258	2,991,100,349
610 Proposed Revenue	SUM1 r400 c.C	22,299,053,536	5,795,283,783	3,353,177,693	6,700,385,151	2,425,547,455	2,521,366,210
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r180)) - 1	-9.986%	-9.530%	-9.7831%	-11.1206%	-10.1613%	-7.8322%
630 Qualify for Pooling?	If r620 < (Industry r600) then YES else NO	N/A	NO	NO	YES	YES	NO

Miscellaneous Inputs:	Source	Sprint-Total	Frontier-Total	Cincinnati-Total	Chicago-Total	Valo-Total	AllNet-Total
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	N/A	N/A	N/A	N/A	N/A	N/A
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	24,346,832,832	2,604,025,275	3,250,564,000	3,177,272,816	395,595,746	814,879,091
140 LEC Transport MOU	TGT1 r430	24,309,834,904	2,879,062,465	3,594,928,702	3,253,352,631	391,668,270	826,369,854
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G.	(20,872,212)	(1,516,781)	(61,008)	(2,864,780)	(446,596)	(738,045)
160 USAC receipts (at l)	CAP1 r660	61,665,551	2,450,694	467,868	29,716,481	1,742,438	792,375
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	159,566,682	24,625,193	17,467,571	26,313,130	2,858,900	5,628,688
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	17,577,089	2,475,656	2,053,748	14,761,368	560,318	465,711
220 Current Transport ATS Revenue	TGT1 r415	101,023,958	14,632,343	8,923,967	41,141,977	817,956	7,827,821
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	N/A	N/A	N/A	N/A	N/A
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	N/A	N/A	N/A	N/A	N/A
250 Current ATS Rate (Total)	r230 + r240	N/A	N/A	N/A	N/A	N/A	N/A
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	N/A	N/A	N/A	N/A	N/A
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	N/A	N/A	N/A	N/A	N/A	N/A
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	N/A	N/A	N/A	N/A	N/A	N/A
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS +Transl.Target in TGT1 r550+r555		(44,547,330)	(5,833,297)	(4,631,513)	(11,745,887)	(878,347)	(1,430,577)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	N/A	N/A	N/A	N/A	N/A
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	N/A	N/A	N/A	N/A	N/A
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	N/A	N/A	N/A	N/A	N/A
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(20,872,212)	(1,516,781)	(61,008)	(2,864,780)	(446,596)	(738,045)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(32,616,074)	(1,923,809)	0	(26,829,954)	(2,076,230)	359,481
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	-84845766.10343	-13402551.43	-6575530	(19,845,383)	(83,179)	(3,217,147)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	-r100	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(138,334,053)	(16,843,141)	(6,036,538)	(49,540,117)	(2,606,004)	(3,595,711)
560 Total Reductions	r510	(138,334,053)	(16,843,141)	(6,036,538)	(49,540,117)	(2,606,004)	(3,595,711)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>							
600 Revenue @ PCI(r-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	1,133,806,777	143,670,493	137,485,896	253,372,571	19,540,321	39,431,603
610 Proposed Revenue	SUM1 r400 c.C	954,263,431	124,490,678	126,157,534	202,826,220	16,551,766	37,892,406
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 + r180)) - 1	-10.9946%	-11.8462%	-7.9263%	-9.3133%	-7.0015%	-1.9328%
630 Qualify for Pooling?	if r620 < (Industry r620) then YES else NO	YES	YES	NO	NO	NO	NO

Allocation of Required Revenue Reduction  
 Filing Date 06/16/00 (Run 3; chainweighted GDPP)  
 Company Industry  
 CALLS TRP - July 2000

Page 3

Miscellaneous Inputs:	Source	INS:Total
<b>Target Inputs</b>		
100 Industry MOU Reduction Target	Input	N/A
110 ATS Rate Floor	TGT1 r470	N/A
<b>Demand Inputs</b>		
130 LS MOU	TGT1 r420	769,613,855
140 LEC Transport MOU	TGT1 r430	1,045,367,872
<b>Revenue Input</b>		
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G-CAP1 r660	(862,594)
160 USAC receipts (at t)		7,376,486
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>		
200 Current LS ATS Revenue	TGT1 r100	7,418,889
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	1,084,295
220 Current Transport ATS Revenue	TGT1 r415	2,132,870
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A
250 Current ATS Rate (Total)	r230 + r240	N/A
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	N/A
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	N/A
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>		
300 X-Factor Reduction Targeted to ATS +Transf.Targetin TGT1 r550+r555		(2,155,892)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A
<b>Reductions:</b>		
400 Reductions from USF Removal TRP	r150	(862,594)
<b>CALLS CCL Reductions</b>		
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(7,567,176)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>		
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(2,583,196)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>		
500 Industry MOU Reduction Target	-r100	N/A
510 Final Reduction Amount	r400 + r410 + r430	(11,012,966)
560 Total Reductions	r510	(11,012,966)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after Implementation of</b>		
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	53,169,194
610 Proposed Revenue	SUM1 r400 c.C	41,111,209
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r160)) - 1	-10.223%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	YES

Allocation of Required Revenue Reduction  
 Filing Date 06/16/00 (Run 3; chainweighted GDPP)  
 Company: Bell Atl-Total  
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Miscellaneous Inputs:	Source	Bell Atl-Total	Bell Atl-North	Bell Atl-South
<b>Target Inputs</b>				
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	N/A	0.0055	0.0055
<b>Demand Inputs</b>				
130 LS MOU	TGT1 r420	136,810,869,638	60,229,270,398	76,381,599,240
140 LEC Transport MOU	TGT1 r430	138,801,063,492	62,352,473,198	76,548,590,294
<b>Revenue Input</b>				
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G- F)	(11,804,282)	(7,236,394)	(4,567,888)
160 USAC receipts (st i)	CAP1 r660	54,721,190	23,205,076	31,516,115
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>				
200 Current LS ATS Revenue	TGT1 r100	747,561,870	466,704,925	280,856,945
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	163,302,031	80,989,205	82,312,826
220 Current Transport ATS Revenue	TGT1 r415	294,483,479	136,510,140	157,973,339
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.009093	0.004755
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.002189	0.002064
250 Current ATS Rate (Total)	r230 + r240	N/A	0.011283	0.006818
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.005783	0.001318
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	448,994,586	348,294,891	100,699,695
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	461,492,638	360,572,986	100,919,852
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>				
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(205,788,471)	(104,868,620)	(100,919,851)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(243,426,271)	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	52.16%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	NO	YES
<b>Reductions:</b>				
400 Reductions from USF Removal TRP	r150	(11,804,282)	(7,236,394)	(4,567,888)
<b>CALLS CCL Reductions</b>				
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		0	0	0
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>				
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(353,087,844)	(252,400,936)	(100,696,907)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>				
500 Industry MOU Reduction Target	'N/A' on individual LEC sheets	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(364,892,126)	(259,837,330)	(105,254,795)
560 Total Reductions	r510	(364,892,126)	(259,837,330)	(105,254,795)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>				
600 Revenue @ PCI(i-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	6,460,527,548	3,137,580,205	3,322,947,343
610 Proposed Revenue	SUM1 r400 c.C	5,795,283,783	2,717,172,736	3,078,111,047
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-9.5308%	-12.7536%	-6.4811%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	NO	N/A	N/A

Allocation of Required Revenue Reduction  
 Filing Date 06/16/00 (Run 3; chainweighted GDPP)  
 Company: BellSouth-Total  
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Miscellaneous Inputs:	Source	BellSouth-Total	BellSouth
<b>Target Inputs</b>			
100 Industry MOU Reduction Target	Input	N/A	N/A
110 ATS Rate Floor	TGT1 r470	N/A	0.0055
<b>Demand Inputs</b>			
130 LS MOU	TGT1 r420	81,099,966,620	81,099,966,620
140 LEC Transport MOU	TGT1 r430	86,324,075,275	86,324,075,275
<b>Revenue Input</b>			
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G- F)	(82,455,470)	(82,455,470)
160 USAC receipts (at t)	CAP1 r660	83,569,561	83,569,561
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>			
200 Current LS ATS Revenue	TGT1 r100	366,055,927	366,055,927
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	89,037,192	89,037,192
220 Current Transport ATS Revenue	TGT1 r415	263,321,992	263,321,992
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.005612
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.003050
250 Current ATS Rate (Total)	r230 + r240	N/A	0.008662
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.003162
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	256,429,732	256,429,732
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	272,947,825	272,947,825
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>			
300 X-Factor Reduction Targeted to ATS + Transl. Target in TGT1 r550+r555		(135,668,478)	(135,668,478)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300, 0)	N/A	(120,781,254)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	32.99%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	* YES
* Took Vol. Reductio			
<b>Reductions:</b>			
400 Reductions from USF Removal TRP	r150	(82,455,470)	(82,455,470)
<b>CALLS CCL Reductions</b>			
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(8,368,066)	(8,368,066)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>			
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(259,635,583)	(259,635,583)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>			
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(350,459,119)	(350,459,119)
560 Total Reductions	r510	(350,459,119)	(350,459,119)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>			
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	3,800,367,007	3,800,367,007
610 Proposed Revenue	SUM1 r400 c.C	3,353,177,693	3,353,177,693
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-9.7831%	-9.7831%
630 Quality for Pooling?	if r620 < (Industry r620) then YES else NO	NO	N/A

Miscellaneous Inputs:	Source	SBC:Total	AMIR	PINV	PTCA	SNCT	SWTR
<b>Target Inputs</b>							
100 Industry MOU Reduction Target							
110 ATS Rate Floor	Input	N/A	N/A	N/A	N/A	N/A	N/A
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	152,845,980,721	55,575,357,377	992,705,781	40,728,035,303	9,087,824,096	46,462,058,163
140 LEC Transport MOU	TGT1 r430	162,232,413,578	60,942,592,320	858,609,264	42,595,383,472	9,009,673,174	48,826,145,348
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G- F)	(83,941,049)	(9,833,475)	(212,790)	(29,853,690)	(1,031,534)	(43,009,560)
160 USAC receipts (at 1)	CAP1 r660	19,088,139	0	1,273,704	2,329,145	0	15,485,291
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	844,339,066	327,082,237	6,006,963	179,662,482	77,219,235	254,378,149
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	204,165,669	28,308,606	1,469,092	77,000,398	13,222,574	84,164,998
220 Current Transport ATS Revenue	TGT1 r415	395,876,958	174,858,121	8,475,622	74,129,351	35,533,573	102,880,291
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.006395	0.007531	0.006302	0.006952	0.007286
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.002869	0.009871	0.001740	0.003944	0.002107
250 Current ATS Rate (Total)	r230 + r240	N/A	0.009264	0.017402	0.008042	0.013896	0.009394
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.003764	0.011902	0.002542	0.007396	0.003894
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	570,467,941	208,184,684	10,219,447	103,528,249	66,634,750	180,900,812
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	606,795,506	229,386,864	11,815,507	108,274,962	67,212,747	180,105,425
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Targetin TGT1 r550+r555		(243,217,202)	(88,260,136)	(2,030,017)	(67,573,140)	(13,855,316)	(71,498,593)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(120,924,549)	(8,189,429)	(35,855,108)	(52,779,434)	(109,402,219)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	36.97%	136.33%	20.01%	68.35%	43.01%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo If r320 < 31.55 then YES else NO		N/A	NO	NO	YES	NO	NO
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(83,941,049)	(9,833,475)	(212,790)	(29,853,690)	(1,031,534)	(43,009,560)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		0	0	0	0	0	0
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(489,434,455)	(191,454,582)	(3,925,214)	(104,081,775)	(38,217,985)	(151,754,899)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	*'N/A' on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(573,375,504)	(201,288,057)	(4,138,004)	(133,935,465)	(39,249,519)	(194,764,459)
580 Total Reductions	r510	(573,375,504)	(201,288,057)	(4,138,004)	(133,935,465)	(39,249,519)	(194,764,459)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	7,557,826,483	2,661,282,551	63,582,402	2,117,054,885	395,396,979	2,320,509,666
610 Proposed Revenue	SUM1 r400 c.C	6,700,385,151	2,385,207,690	56,672,911	1,859,508,810	347,051,885	2,051,944,055
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 + r160)) - 1	-11.1206%	-10.3738%	-9.0448%	-12.0686%	-12.2270%	-10.9795%
630 Quality for Pooling?	If r620 < (Industry r600) then YES else NO	YES	N/A	N/A	N/A	N/A	N/A

Allocation of Required Revenue Reduction  
 Filing Date 06/16/00 (Run 3; chainweighted GDPPI)  
 Company US WEST-Total  
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Miscellaneous Inputs:	Source	US WEST-Total	USTR	CSIR
<b>Target Inputs</b>				
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A
110 ATS Rate Floor	TGT1/r470	N/A	0.0055	0.0095
<b>Demand Inputs</b>				
130 LS MOU	TGT1/r420	62,238,054,515	60,471,132,071	1,766,922,444
140 LEC Transport MOU	TGT1/r430	65,251,360,148	63,476,847,057	1,774,513,091
<b>Revenue Input</b>				
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G. .F)	0	0	0
160 USAC receipts (ad l)	CAP1/r660	27,877,506	27,414,654	462,852
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>				
200 Current LS ATS Revenue	TGT1/r100	280,330,744	272,417,826	7,912,918
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	61,046,706	59,398,900	1,647,806
220 Current Transport ATS Revenue	TGT1/r415	240,635,443	231,137,289	9,498,154
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.005487	0.005411
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.003641	0.005353
250 Current ATS Rate (Total)	r230 + r240	N/A	0.009128	0.010763
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.003628	0.001263
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	221,650,609	219,418,124	2,232,486
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	232,566,368	230,324,292	2,242,076
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>				
300 X-Factor Reduction Targeted to ATS +Transf.Targetin TGT1/r550+r555		(92,743,212)	(89,911,199)	(2,832,013)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(129,506,925)	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	47.54%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	NO	YES
<b>Reductions:</b>				
400 Reductions from USF Removal TRP	r150	0	0	0
<b>CALLS CCL Reductions</b>				
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1/r110 c(E) reduction for .0095 companies		0	0	0
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>				
430 Actual Targeting Amounts for PCIs	TGT1/r1100	(178,392,132)	(176,154,330)	(2,237,802)
*Row 430 for USTR excludes -2,578,871 which is displayed in TRP but not included in development of \$2.1				
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>				
500 Industry MOU Reduction Target	*N/A* on individual LEC sheets	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(178,392,132)	(176,154,330)	(2,237,802)
<b>560 Total Reductions</b>	r510	(178,392,132)	(176,154,330)	(2,237,802)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>				
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	2,727,769,258	2,727,769,258	0
610 Proposed Revenue	SUM1 r400 c.C	2,425,547,455	2,354,822,434	70,925,021
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r620)) - 1	-10.1613%	-12.8032%	0.0000%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	YES	N/A	N/A

Miscellaneous Inputs:	Source	General Total	GTAL	GTAK	GTCA	GNCA	GTFL
<b>Target Inputs</b>							
100 Industry MOU Reduction Target							
110 ATS Rate Floor	Input TGT1 r470	N/A	N/A	0.0055	N/A	0.0055	N/A
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	44,970,351,809	534,594,714	63,303,836	8,534,472,103	38,343,950	8,025,458,963
140 LEC Transport MOU	TGT1 r430	46,234,654,172	541,482,647	63,303,836	8,729,293,140	38,391,315	8,125,607,355
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1980+4380+7100.7130) (c.G- F)	(56,389,218)	(590,891)	(120,669)	(13,387,140)	(772,228)	(7,915,897)
160 USAC receipts (at t)	CAP1 r660	175,849,399	4,437,570	0	18,605,821	0	25,469,360
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	213,038,442	2,741,295	532,050	19,071,805	0	26,642,919
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	49,097,203	492,364	0	10,928,107	0	4,908,729
220 Current Transport ATS Revenue	TGT1 r415	138,239,676	2,711,822	196,187	11,171,000	0	12,548,638
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.006049	0.008405	0.003146	0.000000	0.003931
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.005008	0.003099	0.001148	0.000000	0.001544
250 Current ATS Rate (Total)	r230 + r240	N/A	0.011057	0.011504	0.004295	0.000000	0.005476
260 Difference in Current ATS Rate and Floor	Max (0, r250 - r110)	N/A	0.005557	0.006004	0.000000	0.000000	0.000000
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	157,511,912	2,970,714	380,065	0	0	0
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	163,658,402	3,008,990	380,065	0	0	0
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(89,257,150)	(1,282,446)	(165,109)	(20,942,534)	(14,123)	(14,220,752)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(1,688,268)	(214,956)	0	0	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	61.58%	40.40%	0.00%	0.00%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	NO	NO	YES	YES	YES
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(56,389,218)	(590,891)	(120,669)	(13,387,140)	(772,228)	(7,915,897)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(130,794,889)	(3,892,717)	41,417	(6,371,200)	0	(18,189,673)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(112,487,944)	(2,147,324)	(332,971)	0	0	0
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(299,672,051)	(6,630,932)	(412,223)	(19,758,340)	(772,228)	(26,105,569)
<b>560 Total Reductions</b>							
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r((20+170+220+230+250) c.A)	2,527,319,443	31,196,435	4,018,931	530,865,762	2,169,843	371,494,266
610 Proposed Revenue	SUM1 r400 c.C	2,171,625,743	23,955,587	3,509,958	497,953,850	293,930	336,206,584
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 + r160)) - 1	-7.6482%	-10.4781%	-12.6644%	-2.7548%	-86.4539%	-2.8375%
630 Qualify for Pooling?	if r620 < (Industry r620) then YES else NO	NO	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	GTHI	GTIR	GAIL	GAIN	GTKY	GAMI
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	0.0055	0.0055	0.0055	0.0055	0.0055	0.0055
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	2,151,353,895	578,035,584	1,805,078,907	2,449,299,804	1,409,579,086	1,658,228,063
140 LEC Transport MOU	TGT1 r430	2,217,874,802	582,459,700	2,016,657,154	2,533,819,165	1,616,092,266	1,709,203,971
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G-CAP1 r660	(1,475,826)	(512,782)	(2,012,641)	(2,560,866)	(1,761,776)	(2,464,403)
160 USAC receipts (at 1)	CAP1 r660	1,463,121	12,200,034	7,193,940	15,288,638	8,335,122	176,835
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	16,110,414	6,236,137	10,845,817	15,713,238	7,140,787	7,941,254
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	2,369,650	671,745	2,540,413	3,556,855	2,079,285	1,681,093
220 Current Transport ATS Revenue	TGT1 r415	15,511,619	3,585,478	10,338,706	8,904,041	8,393,280	10,398,446
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.008590	0.011951	0.007416	0.007868	0.006541	0.005803
240 Current ATS Rate (Transport Portion)	r220 / r140	0.006994	0.006156	0.005127	0.003514	0.005194	0.006084
250 Current ATS Rate (Total)	r230 + r240	0.015584	0.018108	0.012543	0.011382	0.011735	0.011887
260 Difference in Current ATS Rate and Floor	Max (0, r250 - r110)	0.010084	0.012606	0.007043	0.005882	0.006235	0.006387
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	21,693,995	7,286,930	12,712,312	14,405,977	8,788,127	10,590,411
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	22,364,784	7,342,702	14,202,357	14,903,092	10,075,649	10,915,973
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(5,047,658)	(1,861,513)	(4,341,840)	(5,632,058)	(3,190,924)	(4,964,320)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300, 0)	(16,646,336)	(5,425,417)	(8,370,672)	(8,773,918)	(5,597,203)	(6,426,091)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	103.33%	87.00%	77.18%	55.84%	78.38%	80.92%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		NO	NO	NO	NO	NO	NO
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(1,475,826)	(512,782)	(2,012,641)	(2,560,866)	(1,761,776)	(2,464,403)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		0	(11,542,570)	(5,532,865)	(14,473,586)	(7,072,887)	2,083,899
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	-10130494	-3829014	-7763495	(10,589,585)	(5,443,842)	(6,869,786)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	'N/A' on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(11,606,320)	(15,884,366)	(15,309,001)	(27,624,037)	(14,278,505)	(7,050,290)
560 Total Reductions	r510	(11,606,320)	(15,884,366)	(15,309,001)	(27,624,037)	(14,278,505)	(7,050,290)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>							
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	130,303,251	43,397,015	109,383,415	145,830,287	85,657,075	101,396,677
610 Proposed Revenue	SUM1 r400 c.C	115,914,614	26,756,157	91,918,088	116,791,056	69,874,946	91,759,270
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r160)) - 1	-10.0322%	-14.2348%	-10.5013%	-10.5335%	-9.6312%	-9.3466%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	N/A	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	GTMN	GTMQ	GTNM	GTNC	GTOH	GTOR
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	0.0095	0.0055	0.0095	0.0055	0.0055	0.0055
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	9,212,985	380,583,714	165,291,966	880,509,869	2,244,998,156	1,739,446,774
140 LEC Transport MOU	TGT1 r430	9,212,985	383,985,569	166,127,433	866,435,458	2,247,606,229	1,769,718,865
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G-	(428,127)	(468,661)	(144,584)	(968,650)	(2,935,082)	(1,791,853)
160 USAC receipts (at I)	CAP1 r660	0	1,336,420	1,116,767	7,163,042	7,587,599	13,517,433
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	0	2,364,452	259,641	6,600,466	12,970,252	10,589,578
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	0	373,050	187,892	1,401,719	2,490,121	1,974,257
220 Current Transport ATS Revenue	TGT1 r415	16,653	736,317	1,877,936	2,227,984	7,791,251	5,725,142
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.000000	0.007193	0.002708	0.009190	0.006887	0.007223
240 Current ATS Rate (Transport Portion)	r220 / r140	0.001808	0.001918	0.011304	0.002305	0.003468	0.003235
250 Current ATS Rate (Total)	r230 + r240	0.001808	0.009110	0.014012	0.011496	0.010353	0.010458
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	0.000000	0.003610	0.004512	0.005996	0.004853	0.004958
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	0	1,374,086	745,750	5,279,275	10,895,094	8,624,088
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	0	1,386,368	749,520	5,794,459	10,907,751	8,774,175
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf. Target in TGT1 r550+r555		(809)	(791,726)	(420,461)	(1,911,202)	(5,414,002)	(3,863,776)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	0	(582,360)	(325,289)	(3,368,074)	(5,481,092)	(4,780,312)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	0.00%	24.63%	125.26%	50.34%	42.26%	44.95%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		YES	YES	NO	NO	NO	NO
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(428,127)	(468,661)	(144,584)	(968,650)	(2,935,082)	(1,791,853)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		0	(897,003)	(963,585)	(6,550,845)	(5,103,783)	(12,333,175)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	0	(1,375,300)	(502,378)	(4,022,044)	(9,506,117)	(7,204,788)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(428,127)	(2,740,964)	(1,610,547)	(11,541,539)	(17,544,983)	(21,329,816)
<b>Total Reductions</b>							
560 Total Reductions	r510	(428,127)	(2,740,964)	(1,610,547)	(11,541,539)	(17,544,983)	(21,329,816)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>							
600 Revenue @ PCI(I-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	786,997	20,134,533	9,746,312	52,832,719	126,796,024	99,988,962
610 Proposed Revenue	SUM1 r400 c.C	45,846	16,892,003	8,035,020	40,361,825	106,443,805	76,841,060
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 + r160)) - 1	-94.2000%	-10.1399%	-6.8894%	-11.6223%	-10.7078%	-11.1371%
630 Quality for Pooling?	if r620 < (Industry r620) then YES else NO	N/A	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	GTPA	GTST	GTIX	GTWA	GTVA	GTWI
<b>Target Inputs</b>							
100 Industry MOU Reduction Target							
110 ATS Rate Floor	Input	N/A	N/A	N/A	N/A	N/A	N/A
Demand Inputs		TGT1 r470	0.0055	0.0055	0.0055	0.0055	0.0055
130 LS MOU	TGT1 r420	1,436,776,929	830,277,543	4,518,156,221	2,599,184,502	120,273,809	1,190,945,021
140 LEC Transport MOU	TGT1 r430	1,459,910,168	833,869,339	4,602,076,630	2,616,029,679	120,363,654	1,257,533,535
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: $r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130)$ (c.G.	(1,635,934)	(805,911)	(8,046,948)	(3,116,761)	381,366	(1,610,094)
160 USAC receipts (at t)	CAP1 r660	2,852,499	6,835,923	20,480,536	15,439,216	538,604	3,104,732
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	6,663,484	5,146,392	26,212,083	14,686,692	596,498	10,208,900
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	1,691,749	654,884	6,018,310	2,680,337	63,717	1,365,231
220 Current Transport ATS Revenue	TGT1 r415	3,066,594	2,808,852	14,174,507	9,055,635	143,214	4,870,896
230 Current ATS Rate (Switching Portion)	$(r200 + r210) / r130$	0.005815	0.006987	0.007134	0.006682	0.005489	0.008718
240 Current ATS Rate (Transport Portion)	$r220 / r140$	0.002101	0.003368	0.003080	0.003462	0.001190	0.003873
250 Current ATS Rate (Total)	$r230 + r240$	0.007916	0.010358	0.010214	0.010143	0.006679	0.013592
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	0.002416	0.004856	0.004714	0.004643	0.001179	0.008092
270 Minimum Amount to ATS Floor	$r260 * \text{Min}(r130, r140)$	3,470,962	4,031,503	21,296,564	12,068,838	141,816	9,636,945
280 Maximum Amount to ATS Floor	$r260 * \text{Max}(r130, r140)$	3,526,848	4,048,943	21,692,127	12,147,055	141,922	10,175,768
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS +Transl.Target in TGT1 r550+r555		(3,064,904)	(1,849,446)	(10,301,814)	(5,980,454)	(202,310)	(3,908,339)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - (300,0))	(406,059)	(2,182,056)	(10,994,750)	(6,068,383)	0	(6,528,606)
320 Minimum %LS Required to Reach ATS Floor	$-r310 / r200$	6.09%	42.40%	41.95%	41.46%	0.00%	63.95%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Floor if r320 < 31.55 then YES else NO		YES	NO	NO	NO	YES	NO
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(1,635,934)	(805,911)	(8,046,948)	(3,116,761)	381,366	(1,610,094)
CALLS CCL Reductions							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(1,412,972)	(6,274,263)	(14,795,913)	(12,569,493)	(417,311)	(1,794,220)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(3,478,361)	(3,473,133)	(18,571,726)	(10,614,106)	(141,838)	(6,329,247)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	$r400 + r410 + r430$	(6,527,266)	(10,553,307)	(41,414,587)	(26,300,360)	(177,783)	(9,733,561)
560 Total Reductions	r510	(6,527,266)	(10,553,307)	(41,414,587)	(26,300,360)	(177,783)	(9,733,561)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	75,165,374	42,785,196	276,916,313	151,764,521	4,962,775	75,219,270
610 Proposed Revenue	SUM1 r400.c.C	66,829,964	31,544,684	232,931,213	121,515,872	4,711,525	63,835,053
620 Holding Co. % Revenue Chg for Pooling Qualification	$(r610 / (r600 + r160)) - 1$	-7.5822%	-12.2522%	-9.1659%	-10.8633%	0.4951%	-11.4810%
630 Quality for Pooling?	If $r620 < (\text{Industry } r620)$ then YES else NO	N/A	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	GTMC	CCIL	VGTX
<b>Target Inputs</b>				
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r470	0.0055	0.0095	0.0095
<b>Demand Inputs</b>				
130 LS MOU	TGT1 r420	62,242,750	106,818,452	437,884,312
140 LEC Transport MOU	TGT1 r430	62,242,750	119,338,936	446,017,592
<b>Revenue Input</b>				
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: $r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130)$ (c.G-CAP1 r660)	(432,384)	(101,462)	(709,014)
160 USAC receipts (at l)		247,724	326,315	2,132,149
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>				
200 Current LS ATS Revenue	TGT1 r100	492,085	641,819	2,540,386
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	0	193,572	774,122
220 Current Transport ATS Revenue	TGT1 r415	956,835	213,677	814,929
230 Current ATS Rate (Switching Portion)	$(r200 + r210) / r130$	0.007906	0.007821	0.007569
240 Current ATS Rate (Transport Portion)	$r220 / r140$	0.015373	0.001791	0.001827
250 Current ATS Rate (Total)	$r230 + r240$	0.023279	0.009611	0.009396
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	0.017779	0.000111	0.000000
270 Minimum Amount to ATS Floor	$r260 * \text{Min}(r130, r140)$	1,106,585	11,875	0
280 Maximum Amount to ATS Floor	$r260 * \text{Max}(r130, r140)$	1,106,585	13,267	0
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>				
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(184,798)	(280,012)	(1,010,017)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300, 0)	(911,787)	0	0
320 Minimum %LS Required to Reach ATS Floor	$-r310 / r200$	185.29%	0.00%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		NO	YES	YES
<b>Reductions:</b>				
400 Reductions from USF Removal TRP	r150	(432,384)	(101,462)	(709,014)
<b>CALLS CCL Reductions</b>				
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(128,219)	(485,072)	(2,118,855)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>				
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(350,050)	(12,345)	0
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>				
500 Industry MOU Reduction Target	'N/A' on individual LEC sheets	N/A	N/A	N/A
510 Final Reduction Amount	$r400 + r410 + r430$	(910,654)	(598,879)	(2,827,869)
560 Total Reductions	r510	(910,654)	(598,879)	(2,827,869)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>				
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1 r((120+170+220+230+250) cA)	4,794,220	5,514,262	24,399,007
610 Proposed Revenue	SUM1 r400 c.C	3,753,337	4,777,721	18,172,948
620 Holding Co. % Revenue Chg for Pooling Qualification	$(r610 / ( r600 - r160)) - 1$	-17.4455%	-7.9073%	-18.3857%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	N/A	N/A	N/A

Miscellaneous Inputs:	Source	Contel-Total	COAL	COAZ	COCA	COIL	COIN
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1/r470	N/A	0.0055	0.0095	0.0055	0.0055	0.0055
<b>Demand Inputs</b>							
130 LS MOU	TGT1/r420	7,670,978,701	340,848,001	35,242,142	737,265,504	357,949,009	502,348,485
140 LEC Transport MOU	TGT1/r430	8,109,775,350	340,848,001	35,242,142	738,739,943	370,874,209	523,945,097
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140*170+380+410+420+780+880 +1080+1480+1980+4380+7100.7130) (c G- F)	(12,248,786)	(1,848,567)	(36,662)	(1,024,918)	(383,530)	(603,744)
160 USAC receipts (at t)	CAP1/r660	79,625,146	2,037,960	188,413	4,738,018	3,767,898	4,913,269
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1/r100	37,682,116	1,060,344	0	4,726,978	2,178,478	2,855,802
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	9,216,328	268,467	0	1,139,211	324,331	946,167
220 Current Transport ATS Revenue	TGT1/r415	24,108,553	556,454	660,302	3,077,876	1,081,670	2,228,886
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.003899	0.000000	0.007957	0.006992	0.007568
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.001633	0.018736	0.004166	0.002917	0.004254
250 Current ATS Rate (Total)	r230 + r240	N/A	0.005531	0.018736	0.012123	0.009909	0.011822
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.000031	0.009236	0.006623	0.004409	0.006322
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	23,922,773	10,600	325,502	4,882,962	1,578,062	3,175,875
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	25,549,182	10,600	325,502	4,892,727	1,635,045	3,312,410
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS +Transl.Target in TGT1/r550+r555		(20,502,400)	(901,358)	(83,440)	(2,221,514)	(731,206)	(1,898,754)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300.0)	N/A	0	(232,062)	(2,661,448)	(846,856)	(1,777,121)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	0.00%	0.00%	56.30%	38.87%	62.23%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	YES	YES	NO	NO	NO
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(12,248,786)	(1,848,567)	(36,662)	(1,024,918)	(383,530)	(603,744)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1/r110 c(E) reduction for .0095 companies		(73,968,217)	(1,700,047)	(158,555)	(3,765,700)	(3,787,480)	(4,837,075)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1/r1100	(19,057,666)	(10,600)	(93,440)	(3,712,876)	(1,418,516)	(2,299,696)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	*N/A* on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(105,275,669)	(3,559,214)	(288,657)	(8,503,493)	(5,589,526)	(7,740,515)
560 Total Reductions	r510	(105,275,669)	(3,559,214)	(288,657)	(8,503,493)	(5,589,526)	(7,740,515)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1/r(120+170+220+230+250) c(A)	463,780,906	17,257,400	1,801,196	54,693,477	23,168,301	33,707,385
610 Proposed Revenue	SUM1/r400 c.C	349,740,467	13,185,337	1,482,037	46,032,342	18,565,173	25,977,296
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 + r180)) - 1	-8.9587%	-13.4966%	-8.1068%	-7.8532%	-4.3052%	-9.7826%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	NO	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	COKY	COMM	COMT	CONY	CONN	CONC
<b>Target Inputs</b>							
100 Industry MOU Reduction Target							
110 ATS Rate Floor	Input TGT1 r470	N/A 0.0055	N/A 0.0095	N/A 0.0055	N/A 0.0055	N/A 0.0095	N/A 0.0055
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	234,208,296	319,589,538	966,913,116	168,621,145	135,161,835	416,145,601
140 LEC Transport MOU	TGT1 r430	304,817,087	319,589,538	1,124,286,089	168,648,950	135,190,177	417,447,605
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G-CAP1 r660	(2,479,627)	(392,744)	(1,151,071)	(133,597)	(164,256)	(418,949)
160 USAC receipts (at 1)	CAP1 r660	556,287	2,607,146	6,081,388	2,277,537	2,669,401	3,934,770
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	728,856	1,857,998	5,965,951	486,067	974,057	1,285,349
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	289,270	556,571	818,302	76,088	171,311	361,377
220 Current Transport ATS Revenue	TGT1 r415	450,771	760,395	4,936,257	498,581	1,302,783	1,343,122
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.004347	0.007555	0.007016	0.003334	0.008474	0.003957
240 Current ATS Rate (Transport Portion)	r220 / r140	0.001479	0.002379	0.004391	0.002956	0.009637	0.003217
250 Current ATS Rate (Total)	r230 + r240	0.005826	0.009935	0.011407	0.006280	0.018111	0.007175
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	0.000326	0.000435	0.005907	0.000790	0.008611	0.001675
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	76,333	138,863	5,711,531	133,238	1,163,850	696,857
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	99,346	138,863	6,641,129	133,280	1,184,094	699,038
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(637,284)	(798,593)	(2,303,713)	(333,323)	(417,846)	(1105,567)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	0	0	(3,407,818)	0	(746,204)	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	0.00%	0.00%	57.12%	0.00%	76.61%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Floor if r320 < 31.55 then YES else NO		YES	YES	NO	YES	NO <sup>a</sup>	YES
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(2,479,627)	(392,744)	(1,151,071)	(133,597)	(164,256)	(418,949)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(277,981)	(3,025,870)	(4,850,433)	(2,140,632)	(2,540,874)	(3,550,572)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	-76348	-138863	-4185970	(133,260)	(724,961)	(697,502)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(2,833,956)	(3,557,477)	(10,187,474)	(2,407,489)	(3,430,091)	(4,667,023)
560 Total Reductions	r510	(2,833,956)	(3,557,477)	(10,187,474)	(2,407,489)	(3,430,091)	(4,667,023)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after Implementation of</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c(A)	14,370,384	21,065,928	53,054,685	8,784,915	10,267,665	20,617,691
610 Proposed Revenue	SUM1 r400 c.C	11,048,424	17,143,563	41,508,791	6,212,060	6,692,201	15,521,870
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-20.0207%	-7.1252%	-11.6332%	-4.5382%	-11.9246%	-6.9595%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	N/A	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	COPt	COIX	COVA	COWA	CCCA	CCIL
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A	N/A	N/A	N/A
<b>Demand Inputs</b>							
110 ATS Rate Floor	TGT1 r470	0.0055	0.0055	0.0055	0.0055	0.0095	0.0095
<b>Revenue Input</b>							
130 LS MOU	TGT1 r420	338,683,520	249,515,897	2,139,558,442	244,046,707	81,525,002	163,574,550
140 LEC Transport MOU	TGT1 r430	338,683,520	267,657,965	2,140,640,961	374,778,719	81,688,042	169,481,073
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: $r(140.170+380+410+420+780+800+1080+1480+1960+4360+7100.7130)$ (c.G-CAP1 r660)	(360,859)	(404,532)	(1,869,072)	(334,119)	(113,759)	(161,845)
160 USAC receipts (at t)		3,608,754	3,194,935	30,720,063	4,382,337	650,300	1,504,955
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	2,128,998	2,559,459	5,988,838	907,317	522,698	995,515
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	313,423	333,423	2,500,610	436,328	136,710	215,624
220 Current Transport ATS Revenue	TGT1 r415	259,092	754,914	4,972,463	714,781	161,996	80,011
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.007212	0.011594	0.003968	0.005506	0.008088	0.007404
240 Current ATS Rate (Transport Portion)	r220 / r140	0.000765	0.002820	0.002323	0.001907	0.001983	0.000472
250 Current ATS Rate (Total)	r230 + r240	0.007977	0.014414	0.006291	0.007413	0.010072	0.007876
260 Difference in Current ATS Rate and Floor	Max (0, r250 - r110)	0.002477	0.008914	0.000791	0.001913	0.000572	0.000000
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	838,754	2,224,289	1,691,825	466,836	46,592	0
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	838,754	2,386,015	1,692,681	716,912	46,685	0
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf. Targetin TGT1 r550+r555		(982,056)	(926,433)	(5,265,629)	(803,154)	(315,759)	(486,875)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	0	(1,297,856)	0	0	0	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	0.00%	50.71%	0.00%	0.00%	0.00%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		YES	NO	YES	YES	YES*	YES
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(360,859)	(404,532)	(1,869,072)	(334,119)	(113,759)	(161,845)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(3,535,156)	(2,801,768)	(28,787,536)	(4,078,578)	(829,636)	(1,864,015)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCs	TGT1 r1100	(838,754)	(1,733,942)	(1,692,681)	(492,042)	(46,800)	0
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	*'N/A' on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(4,734,769)	(4,940,262)	(32,349,289)	(4,904,739)	(989,995)	(2,025,860)
<b>Total Reductions</b>							
560 Total Reductions	r510	(4,734,769)	(4,940,262)	(32,349,289)	(4,904,739)	(989,995)	(2,025,860)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after Implementation of</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	18,030,851	19,734,376	116,212,690	17,266,561	6,070,596	9,776,731
610 Proposed Revenue	SUM1 r400 c.C	13,211,017	13,540,609	81,512,032	12,012,423	3,948,709	6,573,089
620 Holding Co. % Revenue Chg for Pooling Qualification	$(r610 / (r600 + r610)) - 1$	-8.3961%	-18.1314%	-4.6561%	-6.7664%	-27.1496%	-20.5350%
630 Quality for Pooling?	if r620 < (Industry r620) then YES else NO	N/A	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	YCTX
Target Inputs		
100 Industry MOU Reduction Target	Input	N/A
110 ATS Rate Floor	TGT1 r470	0.0095
Demand Inputs		
130 LS MOU	TGT1 r420	239,781,911
140 LEC Transport MOU	TGT1 r430	257,216,231
Revenue Input		
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G.- CAP1 r660	(366,935)
160 USAC receipts (at 1)		1,781,716
Calculation of Minimum and Maximum Amounts to ATS Floor		
200 Current LS ATS Revenue	TGT1 r100	2,459,611
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	329,116
220 Current Transport ATS Revenue	TGT1 r415	268,181
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.011630
240 Current ATS Rate (Transport Portion)	r220 / r140	0.001043
250 Current ATS Rate (Total)	r230 + r240	0.012673
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	0.003173
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	760,803
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	816,120
Calculation of Minimum LS Cut Necessary to Reach ATS Floor		
300 X-Factor Reduction Targeted to ATS +Transl.Target in TGT1 r550+r555		(880,097)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo If r320 < 31.55 then YES else NO		YES
Reductions:		
400 Reductions from USF Removal TRP	r150	(366,935)
CALLS CCL Reductions		
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(1,437,289)
X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor		
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(761,615)
Calculation of LS % Required to Meet MOU Reduction Target		
500 Industry MOU Reduction Target	"N/A" on Individual LEC sheets	N/A
510 Final Reduction Amount	r400 + r410 + r430	(2,565,839)
560 Total Reductions	r510	(2,565,839)
Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of		
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	17,900,275
610 Proposed Revenue	SUM1 r400 c.C	15,593,485
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-3.1975%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	N/A

Miscellaneous Inputs:	Source	Sprint-Total	UTEG	UCFL	UTIN	UCMW	CENY
<b>Target Inputs</b>							
100 Industry MOU Reduction Target	Input		N/A	N/A	N/A	N/A	N/A
110 ATS Rate Floor	TGT1 r170		N/A	0.0065	0.0065	0.0065	0.0065
<b>Demand Inputs</b>							
130 LS MOU	TGT1 r420	24,346,832,832	1,748,903,644	6,777,441,302	641,177,508	2,648,134,946	3,887,584,146
140 LEC Transport MOU	TGT1 r430	24,309,934,904	1,834,429,090	6,836,831,747	644,986,536	2,742,822,682	3,594,283,489
<b>Revenue Input</b>							
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) { c G... F }	(20,872,212)	(2,326)	(7,373,451)	(778,599)	(3,793,133)	(126)
160 USAC receipts (at t)	CAP1 r660	61,665,551	6,433,940	17,829,635	2,521,244	22,973,129	835,602
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>							
200 Current LS ATS Revenue	TGT1 r100	159,566,682	12,433,268	42,852,837	5,860,362	25,426,737	17,612,461
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	17,577,089	1,728,069	4,064,428	622,548	2,828,591	1,639,024
220 Current Transport ATS Revenue	TGT1 r415	101,023,958	7,488,240	31,145,735	4,182,661	13,276,760	7,762,650
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130		N/A	0.008097	0.006923	0.010111	0.010670
240 Current ATS Rate (Transport Portion)	r220 / r140		N/A	0.004082	0.004556	0.006485	0.004841
250 Current ATS Rate (Total)	r230 + r240		N/A	0.012179	0.011478	0.016596	0.015510
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)		N/A	0.005679	0.004978	0.010096	0.000612
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	118,951,944	9,932,583	33,739,074	6,473,217	23,860,872	2,198,855
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	121,376,129	10,418,310	34,034,728	6,511,672	24,714,050	2,378,285
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>							
300 X-Factor Reduction Targeted to ATS + Transf.Targetin TGT1 r550+r555		(44,547,330)	(3,184,010)	(12,961,386)	(1,631,101)	(7,540,765)	(2,278,285)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)		N/A	(6,748,574)	(20,777,687)	(4,842,116)	(16,320,106)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200		N/A	54.28%	48.49%	82.62%	64.18%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO			N/A	NO	NO	NO	NO*
<b>Reductions:</b>							
400 Reductions from USF Removal TRP	r150	(20,872,212)	(2,326)	(7,373,451)	(778,599)	(3,793,133)	(126)
<b>CALLS CCL Reductions</b>							
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(32,616,074)	0	(11,345,612)	(1,894,059)	(19,853,492)	0
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>							
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(84,845,766)	(7,106,709)	(26,481,479)	(3,480,045)	(15,562,903)	(2,316,833)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>							
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(138,334,053)	(7,109,035)	(45,200,543)	(6,152,703)	(39,209,528)	(2,316,059)
560 Total Reductions	r510	(138,334,053)	(7,109,035)	(45,200,543)	(6,152,703)	(39,209,528)	(2,316,059)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>							
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	1,133,806,777	70,785,079	320,530,513	39,760,621	174,611,152	98,722,782
610 Proposed Revenue	SUM1 r400 c.C	954,263,431	63,735,206	267,007,670	32,706,666	131,124,740	92,229,958
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-10.9946%	-13.1095%	-11.8498%	-12.1718%	-13.5278%	-5.9714%
630 Qualify for Pooling?	if r620 < (Industry r620) then YES else NO	YES	N/A	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	VCNC	UTNW	UTOH	UCSE
<b>Target Inputs</b>					
100 Industry MOU Reduction Target					
110 ATS Rate Floor	Input TGT1 r470	N/A 0.0065	N/A 0.0065	N/A 0.0065	N/A 0.0065
<b>Demand Inputs</b>					
130 LS MOU	TGT1 r420	4,445,478,485	442,405,257	1,488,209,309	2,267,498,236
140 LEC Transport MOU	TGT1 r430	4,496,182,029	444,287,379	1,512,076,748	2,204,035,208
<b>Revenue Input</b>					
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1980+4380+7100.7130) (c.G.)	(4,391,918)	(589,003)	(1,809,658)	(2,133,998)
160 USAC receipts (at t)	CAP1 r660	0	2,715,368	0	8,756,632
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>					
200 Current LS ATS Revenue	TGT1 r100	24,687,328	5,923,224	13,906,206	10,864,260
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	2,495,382	577,008	1,511,640	2,110,398
220 Current Transport ATS Revenue	TGT1 r415	15,866,021	5,139,027	10,222,083	5,940,781
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	0.006115	0.014693	0.010360	0.005722
240 Current ATS Rate (Transport Portion)	r220 / r140	0.003529	0.011567	0.006760	0.002695
250 Current ATS Rate (Total)	r230 + r240	0.009643	0.026260	0.017120	0.008417
260 Difference in Current ATS Rate and Floor	Max ( 0, (r250 - r110)	0.003143	0.019760	0.010620	0.001917
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	13,974,199	8,741,854	15,805,217	4,226,074
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	14,133,584	8,779,044	16,058,696	4,347,760
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>					
300 X-Factor Reduction Targeted to ATS +Transf.Targetin TGT1 r550+r555		(7,604,006)	(1,443,821)	(3,859,377)	(3,944,578)
310 Minimum Remaining Reduction to ATS Floor	Min(-(r270 - r300, 0)	(6,370,193)	(7,298,032)	(11,945,840)	(281,496)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	25.80%	123.21%	85.90%	2.56%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		YES	NO	NO	YES
<b>Reductions:</b>					
400 Reductions from USF Removal TRP	r150	(4,391,918)	(589,003)	(1,809,658)	(2,133,998)
<b>CALLS CCL Reductions</b>					
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E)		4,852,249	(2,327,778)	1,516,112	(3,563,494)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>					
430 Actual Targeting Amounts for PCIs	TGT1 r1100	-14040815.05347	-3312600.058932	-8246783.702257	(4,297,598)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>					
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(13,580,484)	(6,229,381)	(8,540,330)	(9,995,090)
560 Total Reductions	r510	(13,580,484)	(6,229,381)	(8,540,330)	(9,995,090)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of</b>					
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c(A)	189,416,310	34,750,139	94,997,286	101,232,895
610 Proposed Revenue	SUM1 r400 c.C	169,802,638	27,880,438	84,365,038	85,311,078
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r160)) - 1	-10.3020%	-12.9662%	-11.1922%	-7.7481%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	Frontier Total	BTNY	RTCS	VITC
<b>Target Inputs</b>					
100 Industry MOU Reduction Target					
110 ATS Rate Floor	Input TGT1 r470	N/A N/A	N/A 0.0065	N/A 0.0065	N/A 0.0065
<b>Demand Inputs</b>					
130 LS MOU	TGT1 r420	2,604,025,275	1,306,706,520	752,260,275	545,058,480
140 LEC Transport MOU	TGT1 r430	2,879,062,465	1,527,327,941	782,319,441	569,415,083
<b>Revenue Input</b>					
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G- F)	(1,516,781)	(252,893)	(702,253)	(561,635)
160 USAC receipts (at !)	CAP1 r660	2,450,694	0	2,271,808	178,885
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>					
200 Current LS ATS Revenue	TGT1 r100	24,625,193	6,327,308	9,841,302	8,456,582
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	2,475,656	1,286,994	750,392	438,270
220 Current Transport ATS Revenue	TGT1 r415	14,632,343	6,311,390	7,241,566	1,079,387
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.005827	0.014080	0.016319
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.004132	0.009257	0.001896
250 Current ATS Rate (Total)	r230 + r240	N/A	0.009959	0.023336	0.018215
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.003459	0.016836	0.011715
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	23,570,937	4,520,424	12,665,324	6,385,188
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	25,125,572	5,283,643	13,171,411	6,670,518
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>					
300 X-Factor Reduction Targeted to ATS + Transf. Targetin TGT1 r550+r555		(5,633,297)	(2,264,508)	(2,100,747)	(1,268,042)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(2,255,917)	(10,564,577)	(5,117,148)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	35.65%	107.35%	60.51%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	NO	NO	NO
<b>Reductions:</b>					
400 Reductions from USF Removal TRP	r150	(1,516,781)	(252,893)	(702,253)	(561,635)
<b>CALLS CCL Reductions</b>					
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(1,923,809)	0	(1,563,764)	(360,046)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>					
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(13,402,551)	(4,260,775)	(5,205,680)	(3,938,096)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>					
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(16,843,141)	(4,513,668)	(7,471,697)	(4,857,777)
560 Total Reductions	r510	(16,843,141)	(4,513,668)	(7,471,697)	(4,857,777)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after Implementation of S reduction, etc.)</b>					
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	143,670,493	63,494,361	48,691,198	31,484,936
610 Proposed Revenue	SUM1 r400 c.C	124,490,678	57,511,693	40,263,336	26,715,649
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r620)) - 1	-11.8462%	-0.4224%	-13.2618%	-14.6630%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	YES	N/A	N/A	N/A

Miscellaneous Inputs:	Source	Cincinnati-Total	CBTC
<b>Target Inputs</b>			
100 Industry MOU Reduction Target	Input	N/A	N/A
110 ATS Rate Floor	TGT1 r470	N/A	0.0065
<b>Demand Inputs</b>			
130 LS MOU	TGT1 r420	3,250,564,000	3,250,564,000
140 LEC Transport MOU	TGT1 r430	3,594,928,702	3,594,928,702
<b>Revenue Input</b>			
150 CCL & ATS Reduction from USF Removal TRP	USF RATE: $r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130)$ (c.G- F)	(61,008)	(61,008)
160 USAC receipts (at t)	CAP1 r660	467,868	467,868
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>			
200 Current LS ATS Revenue	TGT1 r100	17,467,571	17,467,571
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	2,053,748	2,053,748
220 Current Transport ATS Revenue	TGT1 r415	8,923,967	8,923,967
230 Current ATS Rate (Switching Portion)	$(r200 + r210) / r130$	N/A	0.006006
240 Current ATS Rate (Transport Portion)	$r220 / r140$	N/A	0.002482
250 Current ATS Rate (Total)	$r230 + r240$	N/A	0.008488
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.001988
270 Minimum Amount to ATS Floor	$r260 * \text{Min}(r130, r140)$	6,481,777	6,481,777
280 Maximum Amount to ATS Floor	$r260 * \text{Max}(r130, r140)$	7,146,338	7,146,338
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>			
300 X-Factor Reduction Targeted to ATS + Trans. Targetin TGT1 r550+r555		(4,631,513)	(4,631,513)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(1,830,264)
320 Minimum %LS Required to Reach ATS Floor	$-r310 / r200$	N/A	10.48%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo If r320 < 31.55 then YES else NO		N/A	YES
<b>Reductions:</b>			
400 Reductions from USF Removal TRP	r150	(61,008)	(61,008)
<b>CALLS CCL Reductions</b>			
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		0	0
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>			
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(6,575,530)	(6,575,530)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>			
500 Industry MOU Reduction Target	'N/A' on individual LEC sheets	N/A	N/A
510 Final Reduction Amount	$r400 + r410 + r430$	(6,636,538)	(6,636,538)
560 Total Reductions	r510	(6,636,538)	(6,636,538)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>			
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	137,485,896	137,485,896
610 Proposed Revenue	SUM1 r400 c.C	126,157,534	126,157,534
620 Holding Co. % Revenue Chg for Pooling Qualification	$(r610 / (r600 - r160)) - 1$	-7.9263%	-7.9263%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	NO	N/A

Miscellaneous Inputs:	Source	Citizens-Total	CIC1	CIC2	CTOG	GTNE
<b>Target Inputs</b>						
100 Industry MOU Reduction Target						
110 ATS Rate Floor	Input TGT1/r470	N/A N/A	0.0095	0.0095	0.0095	0.0095
<b>Demand Inputs</b>						
130 LS MOU	TGT1/r420	3,177,272,616	2,480,891,884	447,636,237	86,480,286	162,264,209
140 LEC Transport MOU	TGT1/r430	3,253,352,631	2,556,971,899	447,636,237	86,480,286	162,264,209
<b>Revenue Input</b>						
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G. F.)	(2,864,780)	(2,325,939)	(350,812)	0	(188,029)
160 USAC receipts (at t)	CAP1/r660	29,716,481	19,222,207	9,592,175	0	902,099
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>						
200 Current LS ATS Revenue	TGT1/r100	26,213,130	17,527,907	5,381,169	1,384,128	1,919,826
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	14,761,368	11,667,919	2,608,672	216,066	268,711
220 Current Transport ATS Revenue	TGT1/r415	41,141,977	36,198,719	4,516,911	192,626	233,721
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.011768	0.017849	0.018504	0.013488
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.014157	0.010091	0.002227	0.001440
250 Current ATS Rate (Total)	r230 + r240	N/A	0.025925	0.027940	0.020731	0.014928
260 Difference in Current ATS Rate and Floor	Max (0, (r250 - r110))	N/A	0.016425	0.018440	0.011231	0.005428
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	50,855,331	40,749,017	8,254,208	971,257	880,849
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	52,104,957	41,098,643	8,254,208	971,257	880,849
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>						
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1/r550+r555		(11,745,687)	(8,937,710)	(2,226,623)	(135,690)	(445,864)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300, 0)	N/A	(31,811,307)	(6,027,585)	(835,567)	(435,185)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	181.49%	112.01%	60.37%	22.67%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo If r320 < 31.55 then YES else NO		N/A	NO	NO	NO	YES <sup>a</sup>
<b>Reductions:</b>						
400 Reductions from USF Removal TRP	r150	(2,864,780)	(2,325,939)	(350,812)	0	(188,029)
<b>CALLS CCL Reductions</b>						
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1/r110 c(E) reduction for .0095 companies		(26,829,954)	(17,009,022)	(8,923,887)	0	(897,045)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>						
430 Actual Targeting Amounts for PCIs	TGT1/r1100	(19,845,383)	(14,467,764)	(3,924,382)	(572,388)	(880,849)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>						
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(40,540,117)	(33,802,725)	(13,199,081)	(572,388)	(1,965,923)
<b>560 Total Reductions</b>						
560 Total Reductions	r510	(40,540,117)	(33,802,725)	(13,199,081)	(572,388)	(1,965,923)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>						
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1/r(120+170+220+230+250) c.A)	253,372,571	197,767,358	41,753,569	3,280,520	10,571,124
610 Proposed Revenue	SUM1/r400 c.C	202,826,220	164,383,021	27,385,404	2,592,240	8,485,555
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 + r160)) - 1	-9.3133%	-7.9320%	-14.8501%	-20.9808%	-12.4467%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	NO	N/A	N/A	N/A	N/A

Miscellaneous Inputs:	Source	Valor Total	GTOK
<b>Target Inputs</b>			
100 Industry MOU Reduction Target			
110 ATS Rate Floor	Input	N/A	N/A
<b>Demand Inputs</b>			
130 LS MOU	TGT1 r420	395,595,746	395,595,746
140 LEC Transport MOU	TGT1 r430	391,688,270	391,688,270
<b>Revenue Input</b>			
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G.-F)	(446,596)	(446,596)
160 USAC receipts (at 1)	CAP1 r660	1,742,438	1,742,438
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>			
200 Current LS ATS Revenue	TGT1 r100	2,656,900	2,656,900
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	560,318	560,318
220 Current Transport ATS Revenue	TGT1 r415	617,956	617,956
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.008133
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.001578
250 Current ATS Rate (Total)	r230 + r240	N/A	0.009710
260 Difference in Current ATS Rate and Floor	Max (0, r250 - r110)	N/A	0.000210
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	82,357	82,357
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	83,179	83,179
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>			
300 X-Factor Reduction Targeted to ATS + Transf.Target in TGT1 r550+r555		(876,347)	(876,347)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	YES
<b>Reductions:</b>			
400 Reductions from USF Removal TRP	r150	(446,596)	(446,596)
<b>CALLS CCL Reductions</b>			
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1 r110 c(E) reduction for .0095 companies		(2,076,230)	(2,076,230)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>			
430 Actual Targeting Amounts for PCIs	TGT1 r1100	(83,179)	(83,179)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>			
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(2,606,004)	(2,606,004)
<b>560 Total Reductions</b>	r510	(2,606,004)	(2,606,004)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>			
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1 r(120+170+220+230+250) c.A)	19,540,321	19,540,321
610 Proposed Revenue	SUM1 r400 c.C	16,551,766	16,551,766
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r160)) - 1	-7.0015%	-7.0015%
630 Quality for Pooling?	If r620 < (Industry r620) then YES else NO	NO	N/A

Miscellaneous Inputs:	Source	AT&T PrcCap-Totals LTNE	
<b>Target Inputs</b>			
100 Industry MOU Reduction Target	Input	N/A	N/A
110 ATS Rate Floor	TGT1/r470	N/A	0.0065
<b>Demand Inputs</b>			
130 LS MOU	TGT1/r420	814,879,091	814,879,091
140 LEC Transport MOU	TGT1/r430	826,369,854	826,369,854
<b>Revenue Input</b>			
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c.G. F)	(738,045)	(738,045)
160 USAC receipts (at 1)	CAP1/r660	792,375	792,375
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>			
200 Current LS ATS Revenue	TGT1/r100	5,628,688	5,628,688
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	465,711	465,711
220 Current Transport ATS Revenue	TGT1/r415	7,827,821	7,827,821
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.007479
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.009473
250 Current ATS Rate (Total)	r230 + r240	N/A	0.016851
260 Difference in Current ATS Rate and Floor	Max (0, r250 - r110)	N/A	0.010451
270 Minimum Amount to ATS Floor	r260 * Min(r130, r140)	8,516,659	8,516,659
280 Maximum Amount to ATS Floor	r260 * Max(r130, r140)	8,636,754	8,636,754
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>			
300 X-Factor Reduction Targeted to ATS +Transf.Targetin TGT1/r550+r555		(1,430,577)	(1,430,577)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300, 0)	N/A	(7,086,082)
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	125.89%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo if r320 < 31.55 then YES else NO		N/A	NO
<b>Reductions:</b>			
400 Reductions from USF Removal TRP	r150	(738,045)	(738,045)
<b>CALLS CCL Reductions</b>			
410 CCL Reduction from CALLS TRP, incl. Mandatory CC SUM1/r110 c(E) reduction for .0095 companies		359,481	359,481
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>			
430 Actual Targeting Amounts for PCIs	TGT1/r1100	(3,217,147)	(3,217,147)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>			
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(3,595,711)	(3,595,711)
<b>560 Total Reductions</b>	r510	(3,595,711)	(3,595,711)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>			
600 Revenue @ PCI(l-1) (input to USF filing)	USF SUM1/r(120+170+220+230+250) c.A)	39,431,603	39,431,603
610 Proposed Revenue	SUM1/r400 c.C	37,892,406	37,892,406
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / (r600 - r160)) - 1	-1.9328%	-1.9328%
630 Quality for Pooling?	if r620 < (Industry r620) then YES else NO	NO	N/A

Miscellaneous Inputs:	Source	INS:Total	GTIA	COIT
<b>Target Inputs</b>				
100 Industry MOU Reduction Target	Input	N/A	N/A	N/A
110 ATS Rate Floor	TGT1:r470	N/A	0.0095	0.0095
<b>Demand Inputs</b>				
130 LS MOU	TGT1:r420	768,613,855	326,567,891	443,045,964
140 LEC Transport MOU	TGT1:r430	1,045,367,972	416,214,528	629,153,444
<b>Revenue Input</b>				
150 CCL & ATS Reduction from USF Removal TRP	USF RTE: r(140.170+380+410+420+780+880 +1080+1480+1960+4360+7100.7130) (c G- F)	(862,594)	(381,524)	(481,070)
160 USAC receipts (al l)	CAP1:r660	7,376,486	2,780,556	4,595,929
<b>Calculation of Minimum and Maximum Amounts to ATS Floor</b>				
200 Current LS ATS Revenue	TGT1:r100	7,418,889	4,565,452	2,853,438
210 Current Other Switching ATS Revenue	TGT1(r105 + r110 + r115)	1,084,295	540,507	543,788
220 Current Transport ATS Revenue	TGT1:r415	2,132,870	709,372	1,423,498
230 Current ATS Rate (Switching Portion)	(r200 + r210) / r130	N/A	0.015635	0.007668
240 Current ATS Rate (Transport Portion)	r220 / r140	N/A	0.001704	0.002263
250 Current ATS Rate (Total)	r230 + r240	N/A	0.017340	0.009930
260 Difference in Current ATS Rate and Floor	Max ( 0, r250 - r110)	N/A	0.007840	0.000430
270 Minimum Amount to ATS Floor	(r260 * Min(r130, r140)	2,750,855	2,580,147	190,708
280 Maximum Amount to ATS Floor	(r260 * Max(r130, r140)	3,533,754	3,282,837	270,817
<b>Calculation of Minimum LS Cut Necessary to Reach ATS Floor</b>				
300 X-Factor Reduction Targeted to ATS +Transf.Targetin TGT1:r550+r555		(2,155,892)	(951,747)	(1,204,145)
310 Minimum Remaining Reduction to ATS Floor	Min(-r270 - r300,0)	N/A	(1,608,400)	0
320 Minimum %LS Required to Reach ATS Floor	-r310 / r200	N/A	35.23%	0.00%
330 Is Entity Within a 31.55% LS Cut of Reaching ATS Flo # r320 < 31.55 then YES else NO		N/A	NO	YES
<b>Reductions:</b>				
400 Reductions from USF Removal TRP	r150	(862,594)	(381,524)	(481,070)
<b>CALLS CCL Reductions</b>				
410 CCL Reduction from CALLS TRP, Incl. Mandatory CC SUM1:r110 c(E) reduction for .0095 companies		(7,567,176)	(2,393,713)	(5,173,463)
<b>X-Factor/LS Reduction for Companies Within a 31.55% LS Cut of Reaching the ATS Floor</b>				
430 Actual Targeting Amounts for PCIs	TGT1:r1100	(2,583,196)	(2,392,147)	(191,049)
<b>Calculation of LS % Required to Meet MOU Reduction Target</b>				
500 Industry MOU Reduction Target	"N/A" on individual LEC sheets	N/A	N/A	N/A
510 Final Reduction Amount	r400 + r410 + r430	(11,012,966)	(5,167,384)	(5,845,582)
560 Total Reductions	r510	(11,012,966)	(5,167,384)	(5,845,582)
<b>Calculation of Average Revenue Reduction for Pooling Qualification (after implementation of S reduction, etc.)</b>				
600 Revenue @ PCI(t-1) (input to USF filing)	USF SUM1:r(120+170+220+230+250) c.A)	53,169,194	22,769,344	30,399,850
610 Proposed Revenue	SUM1:r400 c.C	41,111,209	17,138,239	23,972,970
620 Holding Co. % Revenue Chg for Pooling Qualification	(r610 / ( r600 - r160)) - 1	-10.2232%	-14.2607%	-7.0956%
630 Qualify for Pooling?	If r620 < (Industry r620) then YES else NO	YES	N/A	N/A